

This Form 99 is being filed in response to the FEC's December 8, 2006 letter regarding Pfizer Inc. PAC's (the PAC) October Monthly Report (9/1/06-9/30/06). Specifically, the issues raised by the FEC in its letter concerns certain contributions made to the PAC that were designated as Memo entries. These contributions were earmarked for certain committees and the corresponding disbursements appeared on Schedule B of the PAC's report and were not designated as Memo entries.

The contributions to the PAC that were earmarked were received by the PAC via payroll deductions. The PAC included the payroll deductions in the total amount of receipts received during the reporting period. The PAC created a second entry for those receipts that were earmarked by the contributor and these receipts were designated as Memo entries to avoid having these receipts counted twice. In some instances the amount of the earmarked contribution exceeded the amount contributed by the individual during the reporting period.

The amount of receipts that appears on the summary page and on the detailed summary pages of the PAC's October Monthly Report includes the total amount of contributions received by the PAC during the reporting period.
